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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SHANNON IRELAND-GORDY and
STEPHANIE IRELAND GORDY, MELISSA
BROAD, and JANE DOE individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

TILE, INC., LIFE360, INC., and
AMAZON.COM, INC.,

Defendants.

Case No. 3:23-CV-04119-RFL

**DECLARATION OF [REDACTED]
[REDACTED] IN SUPPORT OF
PLAINTIFFS' MOTION TO PROCEED
UNDER A PSEUDONYM AS TO JANE
DOE**

Hearing Date: September 17, 2024
Hearing Time: 10:00 a.m.
Judge: Rita F. Lin
Dept. 15

1 I, [REDACTED], hereby declare as follows:

2 1. I am the Jane Doe plaintiff in the above-named lawsuit. I make the statements in this
3 declaration based on my personal knowledge of the matters discussed herein, and if called as a
4 witness, I could and would competently testify to same.

5 2. I was stalked by my ex-boyfriend with a Tile Tracker in March 2024. On or about
6 March 24, 2024, I became concerned when, following the breakup, I was at my friend's boyfriend's
7 house, and was alerted that there was a suspicious person driving down the street. I recognized the
8 person my ex-boyfriend.

9 3. I knew my ex-boyfriend had a Life 360 account and became suspicious that he was
10 using a Tile Tracker to follow me. I downloaded the Tile app on my ride home so I could use its
11 Scan and Secure feature. The app showed the Tile Tracker was in my proximity, but did not allow
12 me to locate it, nor did it allow me to trigger a noise or any other sensory alert that enabled me to
13 locate the device.

14 4. On March 28, 2024, I physically removed the front seats of my car, but still could
15 not find the Tile Tracker. Around the same time, I reached out to the police but was informed they
16 could not help me unless the device was found.

17 5. Several days later, I removed the entire back seat of my car and found the Tile
18 Tracker hidden in the car's frame. Once I found the Tile Tracker, I destroyed the device.

19 6. Ever since the stalking, I have had profound trust problems, as well as a more
20 omnipresent anxiety in my day-to-day life. I will not park anywhere that is far from my ultimate
21 destination or out of view of a security camera. I have developed an overwhelming fear my ex-
22 boyfriend could find me and harass me, or worse, expose me to violence. I have had a hard time
23 sleeping, I feel a consistent nervousness, and I am convinced that I am always being followed.

24 7. I am deeply concerned about my identity being made public through this litigation,
25 which may allow my ex-boyfriend to know when I will be in court.

26 8. Within the past month, my ex-boyfriend has committed property damage in
27 retaliation against me and has sent threatening messages to my family, and I am considering trying
28 to get a restraining order against him.

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4 I declare under the penalty of perjury that the foregoing is true and correct and that this
5 declaration was executed on this 2nd day of August 2024 in Chatsworth, California.

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